

Transcript of the Testimony of
341 (a) MEETING OF CREDITORS

September 9, 2022

IN RE: U LOCK, INC.



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341 (a) MEETING OF CREDITORS - 9/9/2022

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Bankruptcy No. 22-20823-GLT

Chapter 7

In re:)
)
U LOCK INC.,)
)
Debtor.)

/

TRANSCRIPT OF RECORDED PROCEEDINGS:

341(a) MEETING OF CREDITORS

September 9, 2022

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PRESENT:

Robert H. Slone, Esquire, United States Trustee

George Snyder

Sarah Wenrich, Esquire

William Otto, Esquire

Christine Biros

Ms. Shanni Snyder

J. Allen Roth, Esquire

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EXHIBITS INTRODUCED: (NONE)

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1 MR. SLONE: Call the Section
2 341(a) Meeting in the case of U Lock Inc.,
3 Case 22-20823-GLT. This is the time and
4 place for the meeting. I'm Robert Slone,
5 the interim Trustee. Allen Roth is present
6 as attorney for U Lock.

7 Mr. Roth, who's present to testify for
8 U Lock today?

9 MR. ROTH: I have George, excuse
10 me, George Snyder here.

11 MR. SLONE: Okay. And what
12 officer is Mr. Snyder?

13 MR. ROTH: Vice president.

14 MR. SLONE: Vice president?
15 Okay.

16 MR. ROTH: Yes.

17 MR. SLONE: Okay. Before, let me
18 swear him in. Mr. Snyder, please raise your
19 right hand. And do you swear that the
20 testimony you're about to give in this
21 matter to be the truth?

22 MR. GEORGE SNYDER: Yes, I do.

23 MR. SLONE: Okay. Now, we have
24 some creditors present. I'm going to ask
25 you to state your name for the record.

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1 Start with Sarah Wenrich.

2 MS. WENRICH: Hi, Mr. Slone.

3 Sarah Wenrich here on behalf of Christine
4 Biros, and William Otto is here as well on
5 behalf of Ms. Biros.

6 MR. SLONE: Okay.

7 MS. WENRICH: My apologies, Ms.
8 Biros is also on the line.

9 MR. SLONE: Okay, great. And
10 Shanni Snyder, are you still present?

11 MS. SHANNI SNYDER: Yes, I am.

12 MR. SLONE: Okay, and you're here
13 for yourself; right?

14 MS. SHANNI SNYDER: Yes.

15 MR. SLONE: Okay.

16 EXAMINATION OF GEORGE SNYDER:

17 BY MR. SLONE

18 Q. Okay, Mr. -- Mr. Snyder, you're
19 testifying as vice president of U Lock. Did
20 you sign -- well, I'll get to that. Did you
21 receive a copy of the informational sheet
22 prepared by the Office of the U.S. Trustee?

23 A. Yes.

24 Q. And did you read that sheet?

25 A. Yes.

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1 Q. Are you personally familiar with the
2 information contained in the petitions,
3 schedules, statements, and related
4 documents, and do they accurately reflect
5 all assets and all liabilities of the
6 company?

7 A. Yes.

8 Q. And did you sign the petition and
9 related documents?

10 A. Yes.

11 Q. Are there any errors or omissions
12 you wish to bring to my attention at this
13 time?

14 A. No.

15 Q. Okay. Other than in the ordinary
16 course of business, did the company sell,
17 transfer, or give away any assets within the
18 four years prior to filing this case?

19 A. Nothing outside the ordinary
20 operation of the business.

21 Q. Yes, no, or will you send me a
22 statement?

23 A. Oh, I'm sorry. I said no, nothing
24 outside --

25 Q. Oh, okay, I'm sorry.

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1 A. -- business.

2 Q. Does the company expect to receive
3 anything of value in the next six months?

4 A. Let me -- let me back up for a
5 minute. I had mentioned to you, we talked
6 about that Kubota tractor I brought in the
7 -- I brought in the serial number for you.
8 That was sold last year.

9 Q. Okay.

10 A. And then the Christine Biros
11 property.

12 Q. Does the company expect to receive
13 anything of value in the next six months?

14 A. Just whatever other rents would be
15 collected.

16 Q. Do you have a claim or cause of
17 action against anyone for any reason or does
18 anyone owe you money?

19 A. Yeah, everything what's in the
20 schedule there.

21 Q. Okay. It says see --

22 A. And it --

23 Q. See schedules. Does the company own
24 any real estate or real estate that has not
25 been listed?

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1 A. Yes.

2 Q. You're saying yes. Is that the
3 property, the 21 acres?

4 A. Yes.

5 Q. And that's subject to the Biros
6 claim; right?

7 A. Correct.

8 Q. What was -- this was an involuntary;
9 right?

10 A. Correct.

11 Q. But you didn't contest it?

12 A. That's correct.

13 Q. So what's the reason for filing this
14 case?

15 A. The reason that the other person
16 filed the -- filed the lawsuit, you mean, or
17 filed the involuntary bankruptcy?

18 Q. Yeah, but why didn't you contest it?

19 A. (Inaudible).

20 Q. I mean, there's a reason that you're
21 in bankruptcy, or you would have contested
22 it?

23 A. Well, I was served -- I was served
24 an involuntary bankruptcy and I kind of
25 actually thought (Inaudible).

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1 MR. SLONE: Whoever that is,
2 please mute yourself.

3 MS. SHANNI SNYDER: (Inaudible)
4 playing.

5 A. We really had, you know, no assets
6 --

7 Q. Hang on, Mr. Snyder.

8 A. We have -- okay.

9 MR. SLONE: Somebody's phone is
10 ringing or something. Check your phones,
11 everybody. Thank you.

12 Q. Okay, Mr. Snyder you can continue.

13 A. Okay, I said we didn't really have
14 any assets. We owed money, and we didn't
15 really have any defenses for the claims. So
16 the bankruptcy may have other defenses.

17 Q. When was U Lock incorporated?
18 Approximately when was it incorporated?

19 Hello? Anybody there?

20 MS. WENRICH: I'm here. I'm
21 still here.

22 MR. OTTO: I'm here.

23 Q. Okay.

24 MR. OTTO: I'm here.

25 Q. When was the company incorporated?

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1 Mr. Roth, do you know?

2 George Snyder and Allen Roth, are you guys

3 on the line? Hello?

4 MR. SLONE: Okay, everybody else
5 is on the line; right? Mr. --

6 MS. WENRICH: Yes.

7 MR. SLONE: Sarah and Bill?

8 MR. OTTO: Yes.

9 MS. SHANNI SNYDER: This is
10 Shanni. I'm still on the line.

11 MR. OTTO: This is Bill Otto.
12 I'm still on the line.

13 MR. SLONE: Okay. What happened
14 to Snyder and Roth?

15 MS. SHANNI SNYDER: Seems like it
16 was disconnected.

17 MR. SLONE: Were they at the same
18 place? Oh, Jesus.

19 MS. SHANNI SNYDER: Oh, me? I
20 have no idea.

21 MR. SLONE: Okay. I don't know
22 what to say.

23 MS. SHANNI SNYDER: I think that
24 was just, the music that was playing was
25 from the office.

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1 MR. SLONE: Could somebody call
2 Roth? Maybe I can call him on my cell
3 phone. Okay, we'll call. (Phone dialing.)

4 MR. SLONE: Hi, Bob Slone
5 calling. We are in a meeting of creditors
6 for U Lock and Allen Roth and George Snyder
7 disappeared. Are they there?

8 MR. ROTH: Hi, this is Allen.

9 MR. SLONE: Allen, you guys
10 disappeared from the --

11 MR. ROTH: Yeah, I was trying to
12 call back in 'cause I have no idea what
13 happened. (Inaudible) went blank.

14 MR. SLONE: Okay, call back in.
15 If not, we'll put you on the -- on, on the
16 cell phone. But call back in right now.

17 MR. ROTH: Okay.

18 MR. SLONE: Thank you.

19 MR. ROTH: We'll do it right now.

20 MR. SLONE: Okay, they're calling
21 back in.

22 Okay, Allen Roth? Hello? (Phone
23 dialing.)

24 UNIDENTIFIED SPEAKER ON PHONE:
25 Allen Roth's office.

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1 MR. SLONE: Yes, Allen said he's
2 trying to call back in. We --

3 UNIDENTIFIED SPEAKER ON PHONE:
4 Okay, hold on a second.

5 MR. SLONE: If not, we'll just
6 put -- we'll just do it on the cell phone.

7 MR. ROTH: All right, this is
8 Allen. We're back.

9 MR. SLONE: Okay, great. So you
10 have your backup music on, Allen. Okay,
11 I'll turn -- that's on the other line. I'll
12 turn that off. Okay, we're back.

13 CONTINUATION OF EXAMINATION OF GEORGE SNYDER:

14 BY MR. SLONE

15 Q. Okay, Mr. Snyder, the last question,
16 when was this company incorporated?

17 A. In 2015.

18 Q. Who are the officers?

19 A. It was -- okay, I was going to
20 elaborate on the -- on the corporation part
21 'cause that was kind of what brought us
22 here. Or is that enough for you?

23 Q. That's enough for right now. Just
24 who are the officers now, or at the time of
25 the filing?

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1 A. My brother, Kash Snyder.

2 Q. Kash, what was he?

3 A. President.

4 Q. And you're vice president, George
5 Snyder?

6 A. Yes.

7 Q. Any other officers?

8 A. No.

9 Q. Who are the shareholders?

10 A. There's a company called Accredited
11 Business Consolidators Corp and --

12 Q. Could you speak up, please?

13 A. Yes. There's a company called
14 Accredited Business Consolidators Corp, and
15 there's over a thousand shareholders, so we
16 issued, issued shares. But I'm the majority
17 shareholder.

18 Q. How much do you own, what
19 percentage?

20 A. I think it's 51 percent.

21 Q. I didn't see that Accredited
22 creditors listed in your schedules. Is --

23 A. You know what, when we -- I'm going
24 back to with Biros, I was 51 percent. With
25 currently I'm 90 percent.

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1 Q. You're 90 percent?

2 A. We can send you a shareholder list.

3 Q. Yeah, you should do that. Do they
4 know that this company is in bankruptcy?

5 A. We provided Otto with a list.

6 Q. Well, he's -- so what? Who's John
7 Biros?

8 A. They -- and they probably don't know
9 the bankruptcy.

10 Q. It says he owns 25 percent of this
11 company.

12 A. Who is that?

13 Q. John, on your statement, Question
14 No. 28, list all the debtors, officers,
15 directors, managing members, general
16 partners, members in control, controlling
17 shareholders, or other people in control of
18 the debtor. You have one person listed,
19 John Biros, 25 percent. It says a silent
20 partner from inception. Your name's not
21 listed. Kash isn't listed. No other names
22 are listed here. So why don't you file an
23 amended schedules so we know --

24 A. Okay.

25 Q. -- where we're coming from.

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1 A. Silent partner. Okay, we'll file an
2 amended.

3 Q. How many employees did the company
4 have when the bankruptcy was filed?

5 A. None.

6 Q. None. When's the last time the
7 company had employees?

8 A. Up till recently, we had -- there
9 was always someone helping there. There was
10 always about a half a dozen people helping
11 at different times, you know, throughout the
12 years. But just the -- just limited, you
13 know, just a few hours a year.

14 Q. Can you get me the records of that?
15 Were the withholding taxes paid for the
16 taxes for those employees? Were they issued
17 W-2's?

18 A. Okay, I'll get you the records for
19 the people that worked.

20 Q. Give me copies of the W-2's for the
21 last four years.

22 A. Okay. But there wouldn't be any
23 records 'cause they were -- they were
24 contractors, not -- not -- you know, we
25 didn't have W-2's.

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1 Q. So they weren't employees?

2 A. No.

3 Q. Well, get me records of what, what
4 they were paid.

5 A. Okay. Past four years?

6 Q. Yes.

7 A. Will do.

8 Q. Okay, your bankruptcy schedules said
9 your gross revenues for 2021 were about
10 \$13,000; for 2020 was about \$12,000. Do you
11 --

12 A. Yes.

13 Q. Thirteen two for '21. Do you know
14 what it would have been for 2019?

15 A. Not right offhand. My brother would
16 probably know that.

17 Q. Well, was it in that same range?

18 A. Probably pretty much about the same.
19 (Inaudible) kind of estimate, so I would
20 guess that 2019 would be about the same.

21 Q. Okay. How about years prior to
22 that, has it always been about that much?

23 A. Yeah. Yeah, it's always been
24 (Inaudible).

25 Q. Okay. Does the company have an

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1 accountant?

2 A. No.

3 Q. When -- did the company file tax
4 returns 2020 or 2021?

5 A. No, we did not.

6 Q. Did the company ever file tax
7 returns?

8 A. No.

9 Q. Why?

10 A. That was, in 2015 when we got it,
11 Christine Biros and John Biros were silent
12 partners, and everything was pretty much at
13 their direction this whole time. And they,
14 you know, they ordered us not to file the
15 tax returns because they were indicted by
16 the Attorney General. They wanted to wait
17 until that was over, so we were just in kind
18 of a holding pattern since the inception.
19 And then at some point this lawsuit came
20 about.

21 Q. Since the bank -- yeah, since the
22 bankruptcy was filed, have there been any
23 effort to prepare tax returns?

24 A. Yes, I think we were looking for an
25 accountant and we're just gathering our bank

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1 statements and receipts, everything we're
2 going to need for, to file tax returns,
3 'cause we anticipate the Judge had mentioned
4 he was concerned and wanted tax returns, so
5 we're preparing for that.

6 Q. Has there been any payment to any
7 officers or shareholders in the last two
8 years?

9 A. The -- no.

10 Q. No? If I go back to years three and
11 four, has there been any payments to
12 officers or shareholders?

13 A. No for three and four. But let me
14 back up. The last question you asked, was
15 that, you asked for the -- what year were
16 you asking as far as the payments to --

17 Q. Last two years. Well, let's say
18 '22, '21, or '20.

19 A. Yes, in 2021 the -- there was that
20 tractor we had mentioned, the Kubota that
21 was sold. There was money there and that
22 was -- that was used to reimburse me for
23 loans I provided to U Lock over the past
24 six, seven years.

25 Q. And how much was that?

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1 A. The sale of the tractor was \$45,000.

2 Q. And you got the \$45,000?

3 A. Most of it.

4 Q. And that was --

5 A. From two thousand --

6 Q. -- to reimburse you?

7 A. Yes.

8 Q. For loans?

9 A. Yes.

10 Q. Can you get me the information
11 regarding this sale and when you got that
12 money for the Kubota?

13 A. Okay. Allen, could you -- piece of
14 paper?

15 Q. Anything else?

16 A. No, I think that's it. Well, yeah,
17 as far as what I paid back to my sister
18 also, Tammy, I had to pay her back
19 approximately \$7,000 for, she had loaned the
20 company money for property taxes one year.

21 Q. When was that done?

22 A. (Inaudible) we anticipate getting
23 our taxes done here in the next 90 days.

24 Q. When was Tammy paid? Is that Tammy
25 Snyder?

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1 A. Yes. Or Tammy, Tammy McCarl, M-C-
2 C-A-R-L.

3 Q. So she was paid \$7,000 to reimburse
4 her for taxes?

5 A. Yes.

6 Q. And when, when was that done?

7 A. Right after the sale of the Kubota.

8 Q. Okay.

9 A. That would have been probably
10 December of 2021 or November maybe of 2021.

11 Q. Okay, get me the information on
12 both, on that sale and how the money was
13 disbursed at that time then.

14 A. Okay, great. Yeah, I'll get that to
15 you.

16 Q. Your attorney, Mr. Roth, was there
17 any money paid to him for this bankruptcy
18 yet at this time?

19 A. Not yet.

20 Q. Okay, there was a lawsuit in Federal
21 Court that Shanni Snyder filed against the
22 company last year, I believe, and a default
23 judgment was taken. Why didn't the company
24 defend that case?

25 A. Well, like I said before, we didn't

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1 -- we didn't really have any defenses for
2 it. She had -- she had did the work. At
3 the time we didn't really consider her an
4 employee. She was just, you know, she was
5 doing the work and we had the agreement was,
6 you know, once we got everything together,
7 she would get something. And, you know, we
8 kind of thought she'd go away. We didn't
9 think she was going to follow through with
10 it.

11 Q. Well, if you didn't consider her an
12 employee, why didn't you defend this?

13 A. Pardon me?

14 Q. You said you didn't -- you didn't
15 consider her --

16 A. (Inaudible).

17 Q. -- as an employee. Was there any
18 agreement made with her?

19 A. Just that she would get something
20 when, when we got our, you know, got
21 everything off the ground. We didn't have
22 money to defend it. We would have needed
23 \$10,000 for an attorney at that point,
24 because it's a corporation.

25 Q. So you were aware of the lawsuit

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1 then; right?

2 A. Yes, I was served.

3 MR. SLONE: Okay, I'm going to
4 open up questions to other creditors. We'll
5 start with Sarah Wenrich. If you have any
6 questions, this would be a time. We're
7 going to limit, if we're going to drag this
8 on, we'll -- we'll take a pause and I'll get
9 my other cases and then we'll come back to
10 this. But I'll give you a few minutes now.
11 Sarah, do you have any questions?

12 MS. WENRICH: Okay. Yes, I do.
13 Thanks, Mr. Slone.

14 EXAMINATION OF GEORGE SNYDER:

15 BY MS. WENRICH

16 Q. Mr. Snyder, first off, with regard
17 to your statement earlier that you, that U
18 Lock had no employees and just had
19 contractors, and I just want to make sure I
20 heard you right. You say it was just about
21 a half a dozen people helping throughout the
22 year a couple hours a year; is that right?

23 A. Yes.

24 Q. Okay, so where does your \$99,000
25 claim against the company come from then,

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1 and why wasn't it listed in the schedules?

2 A. The \$99,000 was what Christine would
3 owe me. We were -- Christine was in charge.
4 She was the -- she was the silent partner,
5 and things changed along the way and now
6 this lawsuit came and as, as a result, any
7 work I've done there over the past seven
8 years I didn't get paid. So I never got any
9 officer compensation or anything from her,
10 so that those -- those stem from my wages,
11 not -- not others.

12 Q. And we don't -- we don't agree that
13 she was a silent partner, but even if she
14 was, a silent partner wouldn't have any
15 control over the company; isn't that how a
16 silent partner works? So I'm not sure, can
17 you explain --

18 A. Well, now she's claiming --

19 Q. -- how a silent partner would have
20 control?

21 A. Well, now she's not claiming to be a
22 silent partner; she's claiming to be the
23 owner, that over the past seven years that
24 she was the owner, that that -- that doesn't
25 leave me any compensation for officer salary

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1 or wages, not even minimum wage for the past
2 seven years.

3 MR. SLONE: Well, is she --

4 Q. I want to clarify, she's not the
5 owner of the company. She's the owner of
6 the property. So those are two different,
7 two different issues, no ownership in the
8 company; right? I mean --

9 A. Well, either her or U Lock owes me,
10 you know, at least minimum wage, but she
11 controlled the company.

12 Q. But, Mr. Snyder, you just said that
13 you are not -- there are not employees.
14 And, you know, does it appear on your
15 personal tax returns, the compensation that
16 you're owed or that --

17 A. Are you saying I'm not an employee?

18 Q. You said that U Lock has no
19 employees, so I'm not sure how you would be
20 owed that money. I'm just, I'm trying to
21 close the loop there, and it's not --

22 A. Well, I could --

23 Q. Maybe I'm missing something, but
24 it's not making sense.

25 A. Okay, well, we can file a brief and

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1 describe the work that I've done and --

2 MR. SLONE: Why wasn't it listed
3 in your schedules? I think if I was owed
4 \$99,000, I'd mention it somewhere.

5 A. I could -- I could amend the
6 schedules, but like I said, things changed
7 from us being partners and them controlling
8 the property. Now they're saying they own
9 the property; it's constructive trust and
10 it's under their direction. I did all this
11 work for the past seven years. So they're
12 kind of like, you know, for everything I
13 did, I cleaned out lockers; I met with
14 customers. I, you know, I developed the
15 land. I cleaned the weeds, cut the grass,
16 plowed the snow, did building maintenance,
17 fixed the electrical service.

18 All this stuff was done, and it's just,
19 there was no compensation whatsoever. And
20 they just switched the game (Inaudible),
21 switched it up in the middle here and went
22 from being partners to owners, and then that
23 puts me, you know, with, you know, no
24 compensation for (Inaudible).

25 Q. Mr. Snyder, I'm not -- I'm not

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1 disagreeing that you're a partner or an
2 owner of U Lock, but again, I think that is
3 a different question. And again, you are
4 testifying today on behalf of U Lock, who
5 you say has no employees, and yet you file a
6 claim as an alleged employee, and they just,
7 they don't --

8 A. Well, then maybe --

9 Q. -- match up.

10 A. Maybe I'm, okay, maybe I'm using the
11 wrong terminology. Maybe, like I said
12 before, officer compensation. When I meant
13 no employees, I meant other, there were no
14 employees on the books. We didn't have a
15 regular staff. Nobody was paid in that way.

16 Q. So you said you had contractors, not
17 employees, so do you have 1099's then, if
18 you didn't have W-2's?

19 A. No, we don't have, no W-2's.

20 Q. Do you have -- do you have 1099's?

21 A. Yeah. There are -- or there's not
22 any 1099's because they -- they weren't
23 enough to -- I think they all made less than
24 five or six hundred dollars like per year.
25 So like I said, they were just help. They

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1 came in sometimes when they were needed if
2 there was -- there was no -- nobody was on a
3 40-hour work week. But just me, like I said
4 --

5 Q. Okay, so --

6 A. -- I was entitled to at least
7 minimum wage for the time I worked there or
8 officer compensation.

9 Q. So you, okay, so Ms. Snyder then,
10 Shanni Snyder, your sister, if everyone made
11 less than five or six hundred dollars a
12 year, if she worked for four years, that
13 would be around \$2,000; right?

14 A. I wasn't talking about her 'cause we
15 never -- she didn't make anything. We
16 didn't pay her anything. And like I said,
17 we didn't really even consider her an
18 employee. She was my sister; she was
19 helping out, and the arrangement was, once
20 we got things together, she would make some
21 money. So she kept track of her
22 (Inaudible).

23 Q. So is it your opinion that the
24 default judgment that was obtained in
25 District Court was not truthful and

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1 fraudulent for \$260,000?

2 A. Well, that's not what I said at all.

3 Q. No, no, I'm -- I understand that
4 you're saying you didn't consider her an
5 employee, so I'm trying to get what the
6 company's position on, because you had said
7 you didn't fight it because you didn't have
8 the legal, the money to pay the legal fees;
9 but what is your position on that then if
10 you don't consider her a real employee? And
11 it sounds like people just helped out; their
12 compensation would have been a couple
13 hundred dollars a year. Why is that
14 different there?

15 A. I don't really have a position on
16 that.

17 Q. Okay. I guess I'll move on to the
18 Kubota tractor. So who did it sell to? Who
19 did you last sell the Kubota tractor to?

20 A. Give me back the things I -- it was
21 a private individual. I have, give me one
22 second, I have some papers in front of me.
23 Let me see if I can find his name.

24 Q. Okay.

25 A. Do you have that? You know, I

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1 apologize. I can get that to you, though.
2 I can give to you the (Inaudible). Actually
3 he did have a company. I can't remember the
4 name of his company or his name. But I --
5 but I have all that information that I can
6 get to you.

7 Q. Okay. Yeah, that would be helpful I
8 think and, you know, copy the Trustee on it
9 as well. And would, so 45,000 --

10 A. (Inaudible).

11 Q. -- was what the tractor was sold
12 for. How much did the company originally
13 purchase it for and when?

14 A. I don't know the exact amount, but I
15 think it was around \$65,000. That was
16 purchased in 2016. And Mr. Slone wants me
17 to get everything around that sale to him,
18 so I'll get all that information, the
19 purchase date, the sale date, the person's
20 name. I'll get all that to him.

21 MS. WENRICH: Okay, all right.

22 Mr. Otto, do you have any, any questions?

23 MR. OTTO: Yes, I do.

24 EXAMINATION OF GEORGE SNYDER:

25 BY MR. OTTO

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1 Q. Mr. Snyder, who, who are the
2 secretary and treasurer of U Lock? You're
3 required under Pennsylvania law to have.
4 Can you tell me who they are?

5 A. Who the secretary and treasurer are?

6 Q. That's correct.

7 A. We just have two officers, me and
8 Kash. I guess the treasurer and the
9 secretary had to be (Inaudible) vice
10 president and treasurer. So just between
11 us, we fulfill all the roles of office.

12 Q. Just one moment.

13 That one. It's right up there.

14 Sorry for the interruption.

15 A. Okay.

16 Q. Mr. Snyder, do you have any proof
17 that either John or Christine Biros had
18 anything to do with U Lock or the control of
19 U Lock? Do you have any written evidence?

20 A. As far as like a -- as far as a
21 partnership agreement, you mean, or
22 something like that?

23 Q. Anything. You never issued shares,
24 so, or share certificates?

25 A. Yeah, there -- we had weekly

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1 meetings. Every single Wednesday we went
2 to, they owned a bar named Caesar's, and me
3 and my brother went down there every single
4 Wednesday to meet Christine for our
5 meetings. And then also, John we met almost
6 every single day. And so I'm sure there's
7 some type of evidence, but there's -- we
8 don't have a written agreement as far as the
9 -- them directing the company.

10 Q. Well, if you -- if you met at a bar,
11 is there -- is there any -- I mean, did you
12 ever keep written minutes?

13 A. We have some documentation and we
14 also have, you know, some photographs at
15 times we met. So there is some types of
16 evidence if we had to provide some type of
17 evidence. I do think they claimed in the
18 beginning of the lawsuit that they didn't
19 even know who we were. In fact, they had
20 served the lawsuit by advertising in the Law
21 Journal, so I think John and -- John and
22 Christine both denied our existence in the
23 beginning.

24 So we do have some proof that we were --
25 they knew very well who we were, and they

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1 were trying to be silent partners or secret
2 partners, I guess, they always told me
3 because of the -- because of their
4 indictment for whatever that was
5 (Inaudible). We could get evidence and we
6 could also do a deposition of John and also
7 do a deposition of Christine. And their
8 father was there as well, Bob Biros.

9 Q. Well, I'm not going to get into the
10 -- to the details, but as you already know,
11 because we've been through this issue in
12 State Court, my client denies everything
13 that you've said. And you certainly have
14 the right as an individual to walk into any
15 bar, and if Christine or John happened to be
16 there, then you can call that a meeting, but
17 that doesn't mean that's what it was. Let
18 me move on.

19 A. (Inaudible).

20 Q. Excuse me, excuse me, Mr. Snyder,
21 let -- let me move on.

22 A. (Inaudible).

23 Q. You claim you made a property tax
24 payment. When did you make that and how much
25 was it and what years did it cover?

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1 A. I think that was, it was -- I think
2 it was close to 7,000. I don't have the
3 exact number in front of me. And that was,
4 I actually can't even remember the -- what
5 year it covered. But that would just be for
6 one year. The property taxes are roughly
7 7,000 a year.

8 Q. Do you know when you made that
9 payment?

10 A. No, it was -- my sister made it,
11 Tammy. She made it by check. So we would
12 have a record of that check we could
13 provide.

14 Q. Okay. In the -- in the corporate
15 action you filed to petition for a
16 reorganization, you stated that you had held
17 a shareholders agreement, or I'm sorry, a
18 shareholders meeting. Did you inform any of
19 your 800-plus shareholders of that meeting?

20 A. No, it was a -- it was a -- let me
21 take a drink here for a second. It was just
22 me. It was just the majority shareholders
23 present. (Inaudible) majority shareholders.

24 Q. Now, I don't -- I don't remember
25 what the percentages were, but you listed

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1 Kash Snyder as a shareholder of a
2 substantial number of shares, much greater
3 than, than the 10 percent that you're
4 asserting that he might own if you own 90
5 percent of the company. When did you --
6 when did Mr. Snyder -- when did Kash Snyder
7 transfer his shares to you? Or is -- or is
8 your 90 percent assertion incorrect?

9 A. Well, there's -- there's -- there's
10 over 400 million shares, and I think Kash
11 has about 4 million.

12 Q. That's not the number you listed in
13 your -- in your minutes, in your minutes of
14 the shareholders meeting.

15 A. I gave you a list of the
16 shareholders, didn't I?

17 Q. You know what, that's -- whether you
18 did or not is irrelevant in this, in this
19 bankruptcy.

20 A. Okay.

21 Q. But the point is, and I'm only
22 talking about Kash Snyder at this point, so
23 my question is, when did --

24 A. He testified (Inaudible).

25 Q. -- when did he transfer his shares

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1 to you? Or is the 90 percent that you claim
2 you own incorrect?

3 A. No, Kash (Inaudible).

4 UNIDENTIFIED SPEAKER: And the
5 (Inaudible).

6 A. I could read you the -- I could read
7 you -- yeah, I can --

8 MR. SLONE: Who else is speaking
9 here?

10 Q. Who is speaking in the background?

11 A. Nobody here. I think there's
12 someone -- someone else's end is on the
13 phone here. Just me and Allen sitting here.

14 UNIDENTIFIED SPEAKER: I think
15 they should, you know.

16 MS. SHANNI SNYDER: Not me.

17 UNIDENTIFIED SPEAKER: I think
18 they should.

19 MS. SHANNI SNYDER: It's not me,
20 Shanni. Mine's on mute.

21 MR. SLONE: If this is going to
22 go on, I'm going to ask that we resume later
23 this afternoon and go through the rest of
24 the questioning. I have 14 other cases to
25 be heard this morning, so --

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1 MR. OTTO: What time would you
2 like to do that?

3 MR. SLONE: How about 2:30? Call
4 back in at 2:30.

5 MS. WENRICH: That's, yeah,
6 that's fine.

7 MR. OTTO: That works for me.

8 MR. SLONE: Okay? I'll keep
9 everything here. Call back at 2:30 and be
10 -- get on at 2:30 p.m. today, okay?

11 MS. WENRICH: Thank you.

12 MR. OTTO: All right, very good.

13 MR. SLONE: Thank you.

14 * * * * * (The proceedings
15 were recessed.)

16 * * * * *

17 MR. SLONE: Okay, we're back on
18 the record in the U Lock case, 22-20823-
19 GLT. This is the continuation of the 341(a)
20 meeting which was started this morning.
21 It's now 2:30 p.m. on September 9.

22 When we left, Mr. Otto was asking
23 questions. Mr. Otto, you can resume.

24 CONTINUATION OF EXAMINATION OF GEORGE SNYDER:

25 BY MR. OTTO

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1 Q. Okay. First, Mr. Snyder, can you
2 confirm the sale date of the Kubota
3 equipment? I think you said it was December
4 of 2021; is that correct?

5 A. I actually think it was, I'm pretty
6 sure it was November 15 of 2021.

7 Q. November 15?

8 A. Yes.

9 Q. Okay.

10 A. Correct.

11 Q. Okay, okay. And you said you
12 received \$45,000 for that?

13 A. That's correct.

14 Q. Okay. In your statement of assets
15 and liabilities, among other things, you
16 said that you had not been involved in any
17 environmental, or that U Lock had not been
18 involved in any judicial or administrative
19 proceedings, and you had not been notified
20 by any governmental unit otherwise that you
21 may have -- that the debtor might be liable,
22 and you had never notified any governmental
23 unit of any release of hazardous material.
24 That's in Document 65, Pages 9 and 10 of
25 19. And there's a couple of questions about

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1 that. First of all, U Lock was cited at
2 least twice by North Huntingdon Township for
3 sanitation and accumulation of rubbish and
4 garbage, but you did not report that. Why
5 didn't you report it?

6 A. Well, it was my understanding
7 Christine Biros went to the code enforcement
8 officer of North Huntingdon and said, write,
9 write my property up for as many violations
10 as you can. So I think she was trying to
11 get, you know, some, some strategy there she
12 had. I went to the Township and he said he
13 was not going to write me up; that he was
14 just going to give me a verbal because --

15 Q. Mr. Snyder, excuse me one minute.
16 Mr. Snyder, you were cited on or U Lock was
17 cited on September 5, 2019, and June 21,
18 2021, and that was well before a final
19 determination had been made in the Biros v.
20 U Lock case.

21 A. Okay, I was talking about --

22 Q. And whether -- and whether, whether
23 Christine Biros initiated that or not, you
24 were cited; U Lock was cited by North
25 Huntingdon Township. And when this comment

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1 or the statement to the Bankruptcy Court was
2 filed, you did not report this. So my
3 question is, why didn't you report it?
4 Regardless of who instigated it, the
5 Township issued this.

6 A. Okay, yeah, my previous answer was
7 talking about the most recent. You were
8 talking about September 5 and what other
9 date?

10 Q. September 5, 2019, and June 21,
11 2021.

12 A. Okay. So on those, my -- to the
13 best of my recollection, I believe they --
14 that was just some garbage needed cleaned
15 up. We cleaned it up. There was no
16 environmental issue there. There was no
17 hazardous material or anything like that.
18 It was just a little bit of garbage, and
19 that was resolved. And I think it was just
20 a warning, not a citation. There was no
21 fine that I was aware of.

22 Q. But the -- but the question in the
23 bankruptcy statement is not are you
24 currently under citation; it's have you
25 ever. So I go back to my question, which

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1 you haven't answered yet, why didn't you
2 disclose this?

3 A. Well, what I -- what I said was, I
4 think I didn't consider it a citation. It
5 was just a warning to clean up some garbage.

6 And we did that and they were -- the
7 Township was satisfied. So I didn't think
8 it was a citation. There was no fine or
9 anything like that.

10 Q. Did you discuss this with your
11 attorney, Mr. Roth?

12 A. I discussed pretty much everything
13 with him over the years, so --

14 Q. And he told you that you didn't have
15 to file this, report this?

16 A. If there's a mistake on that, we can
17 -- we can certainly (Inaudible) clarify that
18 on there or whatever Mr. Slone would like me
19 to do. But that's my (Inaudible).

20 Q. Well, let me take this one step
21 further. The next question on that section,
22 has the debtor notified any governmental
23 unit of any release of hazardous materials?
24 Now, this was filed in July of 2022, this
25 year, about a month, maybe six weeks after

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1 the disclosure of PCB's on the site; and yet
2 you say that you never notified any
3 governmental unit of any release, but you
4 testified in court that you had in fact
5 notified the fire department. So what's the
6 truth here?

7 A. I think, I don't -- I don't know
8 what you mean by the truth, but I just think
9 you misunderstood something. I never
10 contacted the fire department. In fact, I
11 think you guys testified that someone else
12 was the initial person to see that fire. I
13 was driving past on the highway and I saw
14 the fire in the parking lot and I pulled in.
15 The fire department was already there.
16 The police department was there. There was
17 at least a dozen personnel from the two
18 outfits. So maybe you misunderstood
19 something, or unless I misspoke in trial,
20 but I don't recall saying that 'cause I
21 never -- I didn't call the fire department.
22 They were there.

23 Q. So, so let me just make sure I
24 understand, Mr. Snyder. At no time
25 whatsoever did you go to North Huntingdon

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1 Township to talk to either the police or the
2 fire department about this event?

3 A. When I was -- I think the next day,
4 I believe, I went to the property and
5 Christine Biros was there with the
6 Commissioner of the Township, and they were
7 talking about the event and they were
8 standing over the -- over the -- over the --
9 the (Inaudible).

10 Q. Did you -- did you ever -- did you
11 ever go to the North Huntingdon Township
12 Building to report anything to the police or
13 to the fire department about this event
14 within the couple of days after it occurred?

15 A. Well, I didn't finish answering what
16 you asked me before. I did speak with the
17 Commissioner. She was there with, you know,
18 with (Inaudible).

19 Q. No, I'm not asking you about what
20 happened -- I'm not asking about what
21 happened at the site.

22 A. (Inaudible) the Township Building.

23 Q. I'm asking if you -- if you ever
24 went to the Township Building to report to
25 the police and the fire department about

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1 this event?

2 A. I don't -- no, I did not go there to
3 report anything because it was already
4 reported; they already got there. I may
5 have went there to ask for a police report
6 or something of that nature or, but that was
7 -- that was already reported. There was no
8 need for me to report anything. And --

9 Q. But at the end of the day, the
10 answer to the 20, to this question, have you
11 ever notified any governmental unit of any
12 release of hazardous material, your answer
13 to that was no, and that's incorrect, is it
14 not?

15 A. I'm not recalling what that -- no,
16 that's not.

17 Q. Well, let me move on. Have you ever
18 paid anything to Mr. Roth for his
19 representation of you in the State Court
20 action Biros versus U Lock?

21 MR. ROTH: Objection.

22 A. Hold on.

23 MR. ROTH: I object to that
24 question. That's irrelevant and it's none
25 of his business anyway.

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1 Q. Well, in -- in a way it is relevant
2 because you have -- Mr. Roth has not filed a
3 claim in this case and he hasn't filed any
4 request for payment of fees. It's been
5 stated both in the State Court action and
6 this action that you had not paid him
7 because you were going to pay him something
8 of value when, when U Lock got turned
9 around. So my question is, do you owe, does
10 U Lock owe anything to Mr. Roth for legal
11 services?

12 A. He's never billed me to this point
13 as far as this bankruptcy goes.

14 Q. Do you think you are going to owe
15 him anything?

16 A. I don't really want to answer that
17 because I --

18 MR. SLONE: I think the question
19 is, maybe I'm wrong, but -- this is Bob
20 Slone -- I think the question is, does U
21 Lock owe Mr. Roth anything, any money for
22 legal services rendered at any time?

23 A. No, not right now.

24 MR. SLONE: So the answer is no?

25 A. No, just for the post bankruptcy.

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1 Q. Okay.

2 A. But till then, no.

3 Q. Okay, now, so, so let me -- let me
4 go a little bit further on this in this way.

5 You said earlier today that when Shanni
6 Snyder's case against U Lock was filed, you
7 did not defend it because you would have had
8 to pay an attorney \$10,000 to represent U
9 Lock. And yet, at that point in time, U
10 Lock was represented by Mr. Roth, and all
11 you would have had to do was ask him to go
12 into court to represent you. If you could
13 -- Mr. Roth represented you from 2017 to
14 2021, and if you never paid him anything for
15 that matter, why would you worry about
16 having to pay him for, for going into court
17 for your sister?

18 A. We -- that's our -- I think that's
19 work product also.

20 MR. SLONE: Well, no, it's a
21 question, is, 'cause we're trying to find
22 out if there's a creditor, if U Lock has
23 another creditor. But you're saying U Lock
24 doesn't owe him any money?

25 A. Well, to clarify it, I said post

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1 bankruptcy. So I --

2 MR. SLONE: No, I'm asking --

3 MR. ROTH: He asked --

4 MR. SLONE: -- for prior
5 services. In other words, you know, does U
6 Lock owe Mr. Roth any money; does he have a
7 claim here?

8 A. No, I don't think. But to answer
9 his, I think the way, what he's kind of
10 asking is, if Allen's representing me
11 without charging at one point, then that
12 means he'll always just represent me for
13 free across the board on anything, is what
14 I'm getting from --

15 MR. SLONE: Well, you can answer
16 that yes or no.

17 A. -- his office.

18 MR. SLONE: If you know.

19 A. Pardon me?

20 MR. SLONE: You can answer that
21 if you know.

22 A. Okay, yeah, I didn't think -- I
23 didn't think that I could just walk in to
24 him and have, say, come represent me in this
25 for free. Plus, I didn't think the -- the

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1 other part of that question, I said we
2 didn't really think that lawsuit
3 (Inaudible), and I had no idea that we'd
4 bankruptcy at this point.

5 Q. (BY MR. OTTO) Well, let me -- let
6 me continue with your sister's case for a
7 moment. You said earlier that the reason
8 that you didn't, among other things, the
9 reason that you did not bother to go in and
10 defend against this, this judgment was
11 because you had no defenses. Well, the easy
12 defense would have been for you to testify
13 that she was not an employee, but you didn't
14 bother to do that.

15 But you and your brother have both given,
16 submitted sworn evidence, number one, that
17 U Lock had no employees throughout that
18 period of time that Shanni Snyder claims she
19 worked for you, and second, that you did not
20 owe anybody any money for employment. So
21 why wouldn't you go in and at least simply
22 state that? Even if you lost, you would at
23 least have put up a bona fide defense
24 against her case?

25 A. I didn't consider -- we didn't

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1 consider her a current employee at the time,
2 and I still --

3 Q. I understand that, but if --

4 A. (Inaudible).

5 Q. But if you don't consider her an
6 employee, you have to assert that defense.
7 You can understand why, under the
8 circumstances, this does not sound like a
9 case of two arm's length parties arguing
10 about an employment situation. This sounds
11 more like a brother and sister deciding that
12 they need to get a judgment in order to file
13 a lien against real estate in another
14 county.

15 A. Yeah, that, that's absolutely not
16 the case. I mean, this whole thing is not
17 an arm's length. Biros, Christine and John
18 --

19 Q. But you allowed your sister --

20 A. (Inaudible).

21 Q. You allowed your sister to get a
22 default judgment against your company. And
23 it wasn't, you know, a default judgment of
24 \$100. It was 130,000. Why wouldn't you
25 even go into court to at least put up a --

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1 A. Like I said, we figured she'd go
2 away.

3 Q. Why would she go away? She got a
4 default judgment. That's your sister.

5 A. (Inaudible).

6 Q. Do you talk to your sister?

7 A. (Inaudible). Pardon me?

8 Q. Never mind, that's a (Inaudible)
9 question.

10 A. Biros and I have known each other
11 since I was a child. We've known each other
12 for 45 years. So, and my sister, we've known
13 each other since we were a child, child.
14 I'm not here today to say nothing was --
15 everything was arm's length. That's not the
16 truth. I was close with my sister. I was
17 close with Biros. I was close with the
18 mother, Liz Biros, Bob Biros.

19 Q. Let -- let me -- let me move on
20 because I don't want you to perjure yourself
21 about the relationship you may have had with
22 the Biros.

23 A. (Inaudible).

24 Q. The -- there -- when the -- when
25 title was transferred to you or to U Lock by

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1 the deeds from the Schur estates, there were
2 a number of trailers and containers on the
3 site. You have in the last couple months,
4 or maybe more than a couple months,
5 transferred a number of those containers and
6 trailers off the site. Why did you transfer
7 them or move them and where are they?

8 A. I believe Mr. Slone said to start
9 moving some of my things out of there, so
10 that would explain the containers. What
11 about the -- what trailers are you referring
12 to? 'Cause I don't recall moving trailers
13 out of there.

14 Q. Well, there were a number -- let me
15 put it this way. Are you saying that, that
16 you own all of those containers that used to
17 be on the U Lock site?

18 A. Are you referring to the ten
19 shipping containers?

20 Q. Yes. Are you -- are you saying that
21 you personally, George Snyder, owns those?

22 A. Yes.

23 Q. When was title transferred to them?

24 A. There is no title. Those are
25 shipping containers. They're just a metal

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1 storage box. I don't believe they have any
2 VIN numbers or titles or anything like that.

3 But I believe I purchased those about 20
4 years ago.

5 Q. Well, I don't think that's correct
6 because those were all sitting on the
7 property when the property was owned by the
8 Schur estate, and those items were assigned
9 to you by the Schur estate in conjunction
10 with the transfer of title by the Schur
11 estate. So those containers appear to be
12 owned by U Lock, not George Snyder?

13 A. Yeah, that's incorrect. I saw that
14 in one of the (Inaudible).

15 Q. And you've already testified in
16 court on the first hearing that those
17 containers are worth \$6,000 apiece?

18 A. No, I was talking about the -- the
19 white water tank. They're 10,000-gallon
20 tanks. They're white poly tanks. That's
21 what I was referring to, not the shipping.

22 Q. No, we were -- no, you were
23 specifically talking about, about
24 containers, the shipping containers.

25 A. When was that?

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1 Q. At the first hearing.

2 A. Okay. If someone asked me the
3 value, I don't know what that -- the value
4 the changes over time with those, but the
5 (Inaudible).

6 Q. Well, the question is, do you have
7 any proof that title of those containers and
8 trailers was transferred to you, as opposed
9 to being still owned by U Lock?

10 A. Yeah, they were -- well, there's no
11 proof as far as the title goes or whatever,
12 but I had -- I was a tenant at U Lock when
13 the -- the old man who owned it, his name
14 was Nick Schur, and I've been a tenant there
15 for I believe 22 years. So when you -- I
16 saw that aerial picture you showed with tops
17 of tractor-trailers and tanks and containers
18 and things. Just because there was an aerial
19 photo doesn't mean -- like most, a lot of
20 that stuff belonged to tenants. And so that
21 was --

22 Q. Do you have any proof that they were
23 -- that they belonged to you before the
24 property was purchased from the Schur
25 estates?

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1 A. I'm not sure. I'd have to look. I
2 mean, that's going back 22 years. But I
3 could see if I have any records of it. But
4 a lot of that big heavy equipment there was
5 mine. And as you know, a lot of the big
6 heavy equipment that Glenn Mowry is claiming
7 himself, there was a guy named Vince and
8 there was all kind of other tenants there,
9 and there's another tractor-trailer I think
10 just left today out of there that belonged
11 to someone from Maryland. So that aerial
12 photo isn't really proof that or that's not
13 really showing ownership of anything. In
14 fact, it's very misleading. It's very
15 (Inaudible).

16 Q. Let me -- let me jump into that
17 since you brought it up. Let me ask you
18 about the orange trailer. Who was the
19 renter who had that stored on your site?

20 A. I believe the company's name is
21 Schapiro Whitehouse.

22 Q. No, because they -- we've -- we've
23 spoken to them and they had told us that
24 they rented to someone else. And so the
25 question is not -- it's not Whitehouse &

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1 Schapiro. They own the trailer, but they
2 rented it to somebody else who then stored
3 it on your site. So the question is, who
4 was renting space on your site to store that
5 trailer?

6 A. They -- they were the contact. They
7 were the ones who made the arrangements.
8 But they did tell me now recently, you know,
9 this past couple days or this month, that
10 there was some thirty or some third party
11 involved. But that's -- they said that's
12 between them, not on our end. So they --
13 they were the ones who (Inaudible).

14 Q. Well, it's my understanding -- it's
15 my understanding that Whitehouse & Schapiro
16 now is claiming that they shouldn't have to
17 have paid the rent because they rented the
18 trailer to somebody else who stored it on
19 your site. Did you ever have any direct
20 contact with Whitehouse & Schapiro when that
21 trailer was originally put on your site?

22 A. That was my only contact. And she
23 just told me the other day she didn't want
24 to pay 'cause she said the Biros family
25 damaged the trailer and they made it

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1 inaccessible. She said she had to pay a
2 thousand dollars for a truck to come out to
3 not be able to pick, get her -- get her
4 trailer. So she said she (Inaudible), that
5 they had to pay, someone's going to have to
6 pay for that.

7 But she never told me that she didn't want
8 to pay it because it wasn't hers. In fact,
9 she said it's their trailer, they want it
10 back, and they want -- they want to pay and
11 square up, and she did immediately. And
12 then it got -- Biros damaged it. And we
13 have video footage (Inaudible).

14 Q. How long -- how long was -- how long
15 was that trailer on the site?

16 A. I believe two years, maybe two years
17 and two months.

18 Q. So that, that trailer showed up on
19 the site in 2020?

20 A. I believe it was November of 2020 if
21 my memory serves me right.

22 Q. And you don't know who entered into
23 a rental agreement with you to (Inaudible) a
24 trailer there?

25 A. (Inaudible).

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1 Q. Because you apparently never
2 collected any rent for it?

3 A. Pardon me?

4 Q. Well, Whitehouse & Schapiro paid the
5 Trustee for a couple of years of rent. So
6 if they had paid you, then they would
7 certainly object to paying the Trustee and
8 they would -- they would have claimed that
9 they had paid you. But apparently they
10 didn't pay you, and apparently whoever
11 entered into the agreement with you didn't
12 pay you either, unless you accepted cash for
13 it?

14 A. No, they -- they --

15 Q. But you still haven't -- who, who is
16 -- who is the person, who is the individual
17 who, who negotiated with you to store that
18 trailer on the site?

19 A. It was a girl from Whitehouse &
20 Schapiro.

21 Q. Okay.

22 A. I believe her (Inaudible).

23 Q. So when we call Whitehouse &
24 Schapiro and ask them if they negotiated for
25 that truck to be there, they're going to say

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1 yep, we talked to George?

2 A. I don't know what they're going to
3 say.

4 Q. 'Cause you know we are going to ask
5 them. We are going to ask them that
6 question.

7 A. But I could clarify that if you'll
8 let me. I spoke with a girl Loretta at
9 Whitehouse --

10 Q. Oh, please do.

11 A. Pardon me?

12 Q. I said please clarify 'cause we're
13 all confused.

14 A. Well, I answered you already, but
15 I'll say it, you know, more clearly
16 hopefully. The only person I dealt with was
17 Whitehouse & Schapiro. I believe a woman
18 named Loretta called and made all the
19 arrangements. Never met her in person.
20 They're from out of state. She did all this
21 over the phone. A couple days later
22 (Inaudible).

23 Q. And this was in 2020?

24 A. Yes.

25 Q. Okay.

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1 A. The trailer showed up on the lot. I
2 never collected any rent from them ever in
3 the two years. Then when I spoke with
4 Whitehouse & Schapiro most recently, a woman
5 named Doll (Phonetic spelling) is who I
6 spoke with. She said Loretta no longer
7 works for them, she said, but it is their
8 trailer and they want to square up and
9 they'll send out a check immediately, which
10 they did, and they sent it to Mr. Slone.

11 That was it. I don't know -- I didn't
12 talk to or meet or know this third party
13 that they talked about. Supposedly they
14 told me that it's their trailer. Sometimes
15 they rent their trailers and third parties
16 do business out of their trailers. But I
17 never met that guy, never seen him. Never
18 seen him, never talked to him on the phone.
19 And that was it. That's all the knowledge I
20 have on that.

21 Q. During, during the Biros versus U
22 Lock state case, did you disclose that you
23 were the president and Kash Snyder I believe
24 was secretary? You now tell us that Kash
25 Snyder is president and you're vice

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1 president, and you don't have a secretary or
2 a treasurer; is that correct?

3 A. No, I -- I said I was the -- I said
4 we fill all the roles, me and my brother.
5 There's no other members other than my
6 brother. And I think I said I was president
7 and that Kash was vice president.

8 Q. I didn't understand that answer.
9 Can you repeat it?

10 A. I think you just had it flip-
11 flopped. You said Kash was president, I was
12 the vice president. I think I'm the
13 president and Kash is the vice president.
14 That's (Inaudible).

15 Q. Okay, so, so your testimony now is
16 that you are president of -- president of U
17 Lock; is that correct?

18 A. Pardon me?

19 Q. You -- you are currently the
20 president of U Lock; is that correct?

21 A. Yes. Now I am because my brother
22 Kash is in a medical facility and he won't
23 be out for, you know, maybe the end of the
24 month.

25 Q. And you do not have a secretary or

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1 treasurer?

2 A. No, we -- we're also -- we hold all
3 the positions, so I'm everything.

4 Q. So you're both -- you are -- you are
5 the secretary and treasurer?

6 A. Yes.

7 Q. Is that right? Okay.

8 A. Yes.

9 Q. This morning you told us that you
10 own 90 percent of U Lock; right?

11 A. Yeah, I think you were asking -- no,
12 I'm not -- I wasn't really sure of the
13 percentages. I know more the -- you were
14 talking about something very specific, and
15 we were -- I had a meeting with Kash over
16 the phone because he hasn't been available.
17 You were talking about the motion to
18 convert. So I had a meeting with him, and
19 we, you know, we both agreed to the motion
20 to convert, so --

21 Q. Well, you -- you have --

22 A. (Inaudible).

23 Q. You have a corporate resolution of U
24 Lock. It says that a meeting of
25 shareholders on June 30, 2022, among other

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1 things, George Snyder owns 345 million
2 shares, Kash Snyder owns 75 million shares,
3 and you had 98.82 percent of the
4 shareholders -- or I'm sorry -- 1.18 percent
5 of the shareholders were not present.
6 That's the 5 million shares that you sold to
7 ABC; is that correct?

8 A. That's correct.

9 Q. Okay. Have you ever communicated
10 anything to those shareholders?

11 A. No.

12 Q. So in fact, if you made a ton of
13 money, then those shareholders could have
14 some tax liability for which they are
15 completely unaware; is that correct?

16 A. That would be a different scenario.
17 If we did, if we made a ton of money, that
18 would be a different scenario. That doesn't
19 mean --

20 Q. I'm sorry, your response was a
21 little garbled. Could you repeat that,
22 please?

23 A. I'm sorry. That would be a
24 different situation. And so if they were
25 paid dividends, they would owe taxes on the

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1 dividends, but we didn't issue any dividends
2 because there was no profit.

3 Q. But you had them listed as
4 shareholders but never informed them that
5 they were shareholders; is that correct?

6 A. No, they're aware they're
7 shareholders. We just didn't notify them of
8 the --

9 Q. Really?

10 A. -- the motion to convert because it
11 was a unanimous vote anyways that we had 98
12 percent approval, so --

13 Q. Well, I can tell you that I have
14 spoken to one of your shareholders, and his
15 first question when I asked him if he was an
16 owner of U Lock shares was, who is U Lock?
17 And I can assure you that he knows -- he
18 knew nothing when I asked him in 2019, and
19 he knew -- he knew nothing when I asked him
20 two months ago. So if you have any evidence
21 that you've informed all your shareholders,
22 you might want to gather it up, because
23 these people don't know.

24 A. So we didn't notify them, so
25 (Inaudible).

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1 Q. Let me move on to my next -- my next
2 area. You've told us that in the last four
3 years you have not had any employees; is
4 that correct? That was your testimony this
5 morning?

6 A. Yes.

7 Q. Okay. So I come back to your
8 sister. If you had no employees in that
9 four-year period, how does she have a claim
10 to maintain?

11 A. Well, I guess the answer to that
12 question --

13 Q. Why didn't you defend it?

14 A. -- is we have no -- we had no
15 employees on the payroll. So maybe that was
16 a better answer. Maybe I, you know, should
17 have said it that way.

18 Q. Well, does that mean you have
19 employees who are not on the payroll?

20 A. I explained my sister's situation,
21 yes.

22 Q. Well, let me ask the question again.
23 Does that mean that you had employees who
24 were not on your payroll?

25 A. We had workers. They were people

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1 that worked there that weren't employees;
2 they weren't on the payroll, but they were
3 people that worked.

4 Q. Well, let -- let me -- let me ask it
5 this way. I concede that you had independent
6 contractors for whom you paid some amount
7 for small jobs and periodically, okay?

8 A. Yeah.

9 Q. But Shanni Snyder claims that she,
10 she worked for you for an extended period of
11 time on a continuous four-year basis. And
12 you're now telling us that you didn't have
13 any employees on the payroll. So my
14 question is, did you have employees who were
15 not on the payroll?

16 A. Yes, me, Kash, and Shanni all
17 worked.

18 Q. And you were not on a payroll? Did
19 you report taxes to the IRS, payroll taxes?

20 A. We, no, never received any pay. We
21 just worked. Shanni, you know, we didn't --
22 she worked for U Lock, but we didn't really
23 consider her an employee. She's my sister,
24 and I thought it was more of a favor and the
25 understanding was when we developed the

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1 property, she would get something. As I
2 said in court, you know, I think my brother
3 might have said that he thought it was
4 sisterly love. But anyhow, she was doing the
5 camera stuff and she was driving through,
6 you know, ten times a week (Inaudible).

7 Q. Well, you said in discovery that was
8 provided as a result of a request from me to
9 your counsel, Mr. Roth, you signed, you
10 personally, George Snyder, signed a document
11 that said you had no employees; U Lock has
12 no employees?

13 A. Yeah, at that time (Inaudible).

14 Q. What's that?

15 A. Yes, and at that time that was the
16 (Inaudible).

17 Q. Well --

18 A. I didn't hear anything about this
19 lawsuit (Inaudible).

20 Q. Well, Shanni Snyder, your sister
21 claims that she worked for you continuously
22 from 2016 to 2020, and that covers the
23 period of time that I asked the question.
24 And in court I asked your brother if she had
25 any connection to U Lock and he said no.

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1 That sounds pretty clear to me that she
2 didn't have a position as an employee or --
3 or in any fashion.

4 But you're now telling us that in fact she
5 was an employee and that she is entitled to
6 a salary of 130,000, which has now been
7 doubled by the Federal Court to \$260,000,
8 which you did not defend on U Lock's behalf?

9 A. I think if I recall (Inaudible).

10 Q. Even though, even though your
11 testimony is that she was not an employee?

12 A. Well, I think, I think, like I said,
13 it's been a couple years, but if I remember
14 correctly, I think you asked this, these
15 same questions of me and my brother Kash,
16 and I think we did tell you that she worked
17 there, and you said why, and I think someone
18 said sisterly love and helping us out or
19 whatever. And that's what we thought at the
20 time. She wasn't (Inaudible).

21 Q. No, that's -- that's incorrect. I
22 asked the question whether she helped on the
23 legal pleadings, and then I asked whether
24 she had anything to do with U Lock. And the
25 answer to the second question, which is

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1 whether she had anything to do with U Lock,
2 and the answer to that question is no.

3 A. (Inaudible).

4 Q. There were two parts to that
5 question. One was her involvement in the
6 pleadings and the legal filing, and the
7 second was whether she had any involvement
8 with U Lock, and the answer to whether she
9 had anything to do with U Lock was no. And
10 your statement --

11 A. I don't recall.

12 Q. -- in discovery was you had no -- U
13 Lock had no employees?

14 A. Yeah, employees get wages, and she
15 wasn't getting any wages. She got nothing.
16 So that's probably why, if that's how I
17 answered it, if it is (Inaudible).

18 Q. Okay. It still begs the question
19 why you didn't defend it in court, but let's
20 move on. You claim that, that you had an
21 outstanding loan from U Lock or to U Lock,
22 that you loaned U Lock some amount of money
23 for which you repaid yourself when you sold
24 the Kubota tractor and you got \$38,000; is
25 that right? That's what you testified this

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1 morning?

2 Are you there? Hello? Anybody there?

3 MS. SHANNI SNYDER: I'm here.

4 MR. SLONE: Allen, Allen, are you
5 there, Allen and George?

6 MR. OTTO: Mr. Slone, that's
7 twice in two days, or in one day.

8 MS. SHANNI SNYDER: Do you have
9 to call them?

10 MR. SLONE: We'll have to call
11 Allen's office again. Shoot, where's his
12 number? Here it is. (Phone dialing.)

13 UNIDENTIFIED SPEAKER ON PHONE:
14 Get disconnected again?

15 MR. SLONE: Yes, we did.

16 UNIDENTIFIED SPEAKER ON PHONE:
17 Hold on. Hang up.

18 MR. ROTH: Yeah, hello.

19 UNIDENTIFIED SPEAKER ON PHONE:
20 No, hang up.

21 MR. SLONE: Allen, are you back?

22 MR. GEORGE SNYDER: Yeah, we're
23 back. Can you hear me? We're good.

24 MR. SLONE: Yes, we can hear you.
25 Go ahead.

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1 MR. GEORGE SNYDER: Okay, we must
2 have got disconnected.

3 CONTINUATION OF EXAMINATION OF GEORGE SNYDER:

4 BY MR. OTTO

5 Q. Mr. Snyder, my last question was,
6 you paid -- you paid yourself back in, after
7 you got payment for the Kubota; is that
8 correct?

9 A. But not -- not for wages. I didn't
10 pay anything for wages.

11 Q. No, I'm just -- but you said you had
12 a loan outstanding --

13 A. Yes, a loan.

14 Q. -- that you had made to U Lock, and
15 that, and you repaid yourself back for that;
16 is that correct?

17 A. Correct.

18 Q. Okay. Were there -- did anybody
19 else loan money to the company?

20 A. Yeah, my sister Tammy.

21 Q. Was that the money for the taxes?

22 A. Yes, the --

23 Q. Okay.

24 A. I believe it was 7,000.

25 Q. Anybody else?

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1 A. I believe my brother Kash did.

2 Biros did.

3 Q. How much did you brother loan?

4 A. I'm not really sure.

5 Q. Okay. Let's see. In your
6 statement, there's a question of whether the
7 -- whether U Lock has any accounts
8 receivable, and you answered no; and yet you
9 have this list of tenants, many of which
10 have never made rental payments. Don't you
11 keep any records of who pays you?

12 A. Well --

13 Q. And who hasn't paid you?

14 A. Yeah, there are some records. I was
15 kind of playing catch-up 'cause my brother
16 was, you know, my brother was, you know, he
17 wasn't around. So we provided the Trustee
18 with everything we had, and then I discussed
19 it personally with Mr. Slone, a couple
20 things, like when that truck came up and,
21 you know, we contacted them and --

22 Q. So there are a lot of renters that,
23 that have not paid money, so you never made
24 any, took any effort to collect from them or
25 to get rid of their property; is that

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1 correct?

2 A. Well, we're attempting that now. A
3 lot of -- a lot of the tenants are --

4 Q. Well, why did -- why did it --

5 A. (Inaudible).

6 Q. Why did it take bankruptcy to get
7 you to start taking action?

8 A. I'm sorry, I couldn't hear anything.
9 I was talking.

10 MR. SLONE: Let's one talk, one
11 person at a time here.

12 Q. Why did it take --

13 MR. SLONE: Go ahead.

14 Q. Why, why did it take the bankruptcy
15 for you to start trying to collect past
16 rents?

17 A. Well, because Christine didn't want
18 her name on anything, so she told us not to
19 sue anybody and she didn't want any, you
20 know, anything coming up in court or
21 anything like that until after, so we just
22 didn't do anything.

23 Q. You understand that Christine is
24 going to tell you that that's not true?
25 And, and whether it's true or not --

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1 A. (Inaudible).

2 Q. -- you're supposed to be president
3 -- you're supposed to be president of this
4 corporation, and you're responsible for
5 trying to make it work, and it apparently
6 has not?

7 A. Well, like I said, most of those
8 people are willing to pay. Anybody, in my
9 experience, anybody that has stuff stored
10 there is more than willing to pay. Even a
11 great example is the lady who just paid
12 \$3,000 because they want their stuff. But
13 it's very difficult 'cause Bob Biros and
14 Christine and their family and Andy and
15 everybody is down there destroying all the
16 tenants' things, blocking access to their
17 stuff. And I'm getting all kind of threats
18 now that they're not going to pay and
19 they're going to sue and they're making some
20 (Inaudible).

21 Q. Have you ever -- have you referred
22 all these communications to the Trustee?

23 A. I let the Trustee know what I've
24 been going through, yeah.

25 Q. So you've been receiving threats

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1 because of damage? Who, who specifically
2 has threatened you?

3 A. I don't know, there's several
4 tenants. Every time I pull down there and
5 there's a different tenant, they complain
6 that they can't get their stuff, they can't
7 get access. There's people running around
8 with dozers.

9 Q. Well, who --

10 A. (Inaudible) and other tractors.

11 Q. Who are they? Who are these people?

12 A. They're tenants.

13 Q. I understand they're tenants. What
14 are their names?

15 A. You know what, I don't know every
16 single person there by, by name or face.
17 When I -- when I come in and I see them, I
18 wave and I say hi. That's about it. My
19 brother dealt with most of the, you know, a
20 lot of those people, so, but --

21 Q. It's beginning to sound like your
22 brother is the one we should have had in the
23 341 meeting?

24 A. Well, he wasn't available. He's
25 been in a facility for several months, so

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1 he, he's going to be discharged I think
2 later this month. So we -- we didn't even
3 have money to collect or to sue people. And
4 Christine didn't want -- you know, she's the
5 one that had the money, but she didn't
6 provide any for us to go after these people
7 (Inaudible).

8 Q. So the long and the short of it is,
9 this is not a viable company unless you get
10 Christine Biros to jump in and pay for
11 everything?

12 A. No.

13 Q. Is that what you're telling us?

14 A. There -- no, not at all. There's
15 plenty of people with money that would love
16 to be involved. But Christine got involved
17 saying she'd take the money or, you know,
18 she was going to give us the money, and then
19 she tried to take over the whole property by
20 saying what she said in court and switching
21 this whole thing around.

22 So she -- we tried to pay her back the
23 money we owed her. Ever since the beginning
24 she will not take the money back. We
25 offered her interest, everything to make her

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1 whole, and they just keep saying they want
2 the -- they want the property, they want the
3 property. They said it's a loan but we don't
4 want paid back; we just want the property.
5 So that instead of just foreclosing on the
6 loan, which would have enabled us to pay
7 them off, she did this, this crazy whole
8 thing saying she didn't know who we were.
9 We went to court. They got a default
10 judgment on us. Then we had to open the
11 judgment. Then we end up in court and they
12 just, they weren't truthful on almost
13 anything they've said on the stand, so --

14 Q. Mr. Snyder, your recollection of
15 this legal case is, is not the same as
16 either mine or Ms. Biros. And I think
17 before you continue to misstate the actions
18 involved, you might want to go back and look
19 at things like the docket and talk to your
20 counsel who was also there.

21 A. Well, this is true (Inaudible).

22 Q. Who maintains all -- who maintains
23 all of your -- who maintains all of your
24 books and records; is it you?

25 A. No, Kash does more of that than me.

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1 I have some access. I have access now to
2 some records, but I haven't been able to,
3 you know, really see him in person because
4 he's at a medical facility. But when --

5 Q. One of the questions --

6 A. (Inaudible).

7 Q. One of the questions here is, list
8 all firms or individuals who were in
9 possession of the debtor's books of account
10 and records when this case was filed, and
11 your answer was none. And you gave no
12 explanation of why they were unavailable.

13 A. (Inaudible.)

14 Q. Is it -- is it -- is it your
15 testimony -- is it your testimony that Kash
16 Snyder has all this stuff and you just can't
17 get to it 'cause he's in an institution?

18 A. I have some stuff, but if there's
19 anything missing, then he would be the -- he
20 would be the one to have that.

21 Q. Okay. In your statement there's a
22 question of, within one year before filing
23 this case, did the debtor provide an insider
24 with the value in any form, including
25 salary, other compensation, draws, bonuses,

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1 loans, credits on loans, stock redemptions
2 and options exercised, and you say no; is
3 that correct?

4 A. Are you looking at the schedule?

5 Q. I am.

6 A. What page is that? I was trying to
7 follow along with you.

8 Q. That is Page, hold on, Page 13 of
9 19, Document No. 65, Question 30.

10 A. This is Page 13?

11 Q. That's correct.

12 A. And what is your question?

13 MR. SLONE: Question No. 30.

14 Q. I'm -- you just -- I'm just asking
15 you if your answer to No. 30 is correct?

16 A. I'm sorry, trying to find Page 13.

17 Q. Yep, down at the bottom. Question
18 30.

19 A. I didn't get a salary and I had --
20 you know, everything, I received repayments
21 on the loans, but no compensation, no
22 salary.

23 Q. So, so this --

24 A. (Inaudible).

25 Q. This question, your answer to this

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1 question is not correct?

2 A. Yeah, the way I read it, the way I
3 read it, I thought it meant salary, and I
4 didn't receive any salary or any payments,
5 no dividends.

6 Q. Let me move on. What, what
7 utilities are at the property at 14140?

8 A. I believe electric service. I think
9 there are sewage and water taps there, but I
10 don't believe U Lock gets a bill for those.

11 Q. How about cable?

12 A. I don't -- no, no cable.

13 Q. Okay. Do you have a camera system
14 at the -- at the property?

15 A. Yes.

16 Q. Where are the cameras located?

17 A. We kind of have cameras there to,
18 you know, because the Biros are still
19 (Inaudible) for a lot of things. I don't
20 know, do I have to tell you the exact
21 locations as to those cameras since your
22 client are the perpetrator?

23 MR. SLONE: Just say how many
24 cameras are there.

25 A. I believe there's -- I believe

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1 there's about ten cameras there. And they
2 face --

3 Q. Well, let me ask you this, Mr. --

4 A. (Inaudible).

5 Q. Mr. Snyder.

6 A. (Inaudible).

7 Q. How -- how does information from
8 those cameras get to some other location if
9 you don't have cable?

10 A. Well, there's -- I believe there's
11 WiFi at the property, but I think it's the
12 motel's WiFi or someone else's and --

13 Q. Oh, so you -- you --

14 A. (Inaudible).

15 Q. You tap into the -- you tap into
16 somebody else's WiFi? Did -- did they give
17 you consent to do that?

18 A. No, I don't -- no, I don't control
19 that camera system, so the one I --

20 Q. Who does?

21 A. The one I control is closed circuit
22 and it's not -- it does not go over WiFi.

23 Q. So it's not remotely available?

24 A. The one that I --

25 Q. Is that correct?

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1 A. That's correct.

2 Q. Okay. So how could Shanni Snyder
3 monitor your camera system, if it's closed-
4 circuit and not remotely available, how
5 could she do that for four years?

6 A. Well, she had the -- no, I, the one
7 I control is closed-circuit and not -- I
8 don't do it, you know, 'cause my sister
9 does, I believe.

10 Q. Well, where -- but it's -- but it's
11 U Lock's system; right? So you're telling
12 me she owns the cameras that monitor U Lock?

13 A. I believe so.

14 Q. So she owns the camera system at the
15 U Lock property; is that correct?

16 A. Some of their -- there's multiple
17 camera systems there, because some of the
18 tenants even have their own systems, I
19 believe. But, yes, she owns her own system,
20 and then the one I have access to is
21 (Inaudible).

22 Q. How, how is her -- how is her system
23 accessible remotely? Where is the WiFi
24 system that, that allows that to happen?

25 A. I'm not sure. I know we don't have

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1 WiFi at the time, but, you know, since -- I
2 don't think we've had it (Inaudible).

3 Q. Well, that was a four-year period
4 where, where she had -- she claims she had
5 access to cameras. You're telling me that
6 you only have a closed-circuit camera, so
7 that couldn't have been -- that couldn't
8 have been what she was using. So she's got
9 her own camera system; is that, is that what
10 you're telling us?

11 A. Yes, she has her own. I think she
12 has a -- I think it's called a Dropcam
13 system. She's a little more technological
14 savvy than me. Mine's kind of like old-
15 school camera, I mean, but it's -- hers has
16 I think (Inaudible).

17 Q. So if we get into the details of
18 this camera system with her when her claim
19 is, is heard by the District Court, which
20 she's appealed, then she'll understand
21 perfectly how this camera system works?

22 A. Well, I know she understands better
23 than me. I'm not -- I'm not real -- like I
24 said, mine's the old-fashioned kind. It's
25 not old-fashioned; it's a high-resolution, I

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1 mean, but it's just not -- I don't -- I
2 don't look at my camera systems on like my
3 cell phone. She does all that. She has all
4 the cellular service and she does that sort
5 of thing.

6 Q. Okay.

7 A. I don't know the (Inaudible) on
8 that.

9 Q. There is currently located on the
10 property a red car?

11 A. Yes.

12 Q. Pretty hard to miss if you drive on
13 -- who owns that?

14 A. The Honda, are you referring to the
15 Honda, the red Honda?

16 Q. I'm only -- I don't remember what
17 brand it was. I'm only aware of one red car
18 on that site at this point.

19 A. Yeah, right in front of the
20 building? That would be --

21 Q. Yeah, who owns that?

22 A. My brother Kash. That's his car.

23 Q. That's Kash's car? Why is his car
24 still there? It's obviously not operable?

25 A. Yeah, I'm not sure. Like, like I

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1 told you before, I don't want to keep
2 repeating. I mean, I feel bad having to
3 keep repeat it, but, you know, there's so
4 much contention there. Biros come down
5 there, kicked me off the property, kicked
6 people off the property. They blocked his
7 car in. You can't get a -- I don't even
8 know if you can get a tow truck back to his
9 car at this point.

10 They covered almost all the roads except
11 for one, and so it's very difficult for
12 anybody to get anything down there. The
13 whole family shows up, Bob Biros, Christine
14 Biros, her son Scotty Biros, Andy Biros,
15 John Biros. They're like a swarm of bees
16 down there and they're harassing everybody,
17 and they're moving stuff around with dozers
18 and backhoes and taking people's property
19 and damaging it. They're pushing everything
20 into a pile. One minute they say it's
21 garbage (Inaudible).

22 Q. You're prepared -- you're prepared
23 to back up these statements in court, I
24 assume, with evidence?

25 A. Pardon me?

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1 Q. But the mean -- but in the meantime
2 --

3 A. (Inaudible).

4 Q. -- the Trustee has, Mr. Snyder, the
5 Trustee has allowed you pretty much
6 unlimited access to the site, and you've --
7 and you've moved a lot of stuff off this
8 site without interference from the Biros.
9 So the question is --

10 A. That's not true. I (Inaudible).

11 Q. -- why is Kash Snyder's broken --
12 excuse me, let me finish my question,
13 please.

14 A. (Inaudible).

15 Q. Why is Mr. -- your brother's red car
16 still on the site? It's clearly not
17 operable and it could be moved just as the
18 other cars were?

19 A. Well, I -- it -- that probably --
20 I'm guessing it wasn't moved by Kash because
21 he's been in a facility since I believe June
22 or July. I could probably get, you know,
23 permission from Kash and work with Mr. Slone
24 to get that car out of there, but it's very
25 difficult to do anything. And I disagree

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1 with you saying I got a lot of stuff out of
2 there. I don't think I got a couple percent
3 of stuff out of there. We took one
4 truckload of pallets (Inaudible).

5 Q. All of those -- all of those
6 shipping containers are gone and most of the
7 trailers are gone?

8 A. Yeah, I don't --

9 Q. So --

10 A. I don't agree with you. I don't
11 think there was -- I think there was only
12 one trailer that I know of that left the
13 site. And the shipping containers were
14 moved months ago. I'm not in agreement with
15 you on your, you know, what you're --

16 Q. Who paid -- who paid the insurance
17 premium for the insurance on the site?

18 A. I paid that personally.

19 Q. Okay. Who is the principal of USAAG
20 that you've been dealing with?

21 A. Well, I was talking to Mike Lavinsky
22 (Phonetic spelling).

23 Q. Do you have contact information for
24 him?

25 A. Not in front of me.

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1 Q. What -- what state was USAAG
2 incorporated in, do you know?

3 A. No, I don't.

4 Q. Is there anybody -- is there anybody
5 else associated with USAAG that you're aware
6 of?

7 A. Yeah, I talked to someone else, but
8 (Inaudible). There's several people.
9 They're slipping my mind right now. There
10 was Mike Lavinsky.

11 Q. How -- how do you know this Mr. Mike
12 Lavesky (Phonetic spelling)?

13 A. You know what, several years ago, he
14 had -- he had called. I don't know if you
15 saw the number on the sideline or whatever.
16 He called and he came and he wanted to meet,
17 and we came out and we looked at the
18 properties. And he's come back a couple
19 times since.

20 Q. Okay. Why have you never applied
21 for an occupancy permit for U Lock on that
22 site?

23 A. I'm not sure. Like I said, Kash, my
24 brother Kash handled most of that stuff.
25 And then I think we were kind of

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1 grandfathered in with, you know, the storage
2 facility, is kind of what the Township told
3 us there, so --

4 Q. I can -- I can assure you that
5 according to North Huntingdon Township, that
6 you are not grandfathered in.

7 A. (Inaudible).

8 Q. Do you pay business privilege tax to
9 North Huntingdon Township?

10 A. Pardon me?

11 Q. Do you pay business privilege tax to
12 North Huntingdon Township?

13 A. I don't think so, but --

14 Q. Any reason why not?

15 A. No, just like we said before, we
16 haven't paid anything. We didn't have the
17 money, so we didn't pay any of the taxes
18 yet. But we don't (Inaudible). We're going
19 to file them.

20 Q. Now, when you had the Kubota
21 machinery, you -- you borrowed -- you
22 entered into a loan agreement, U Lock
23 entered into a loan agreement to purchase
24 that equipment; is that correct?

25 A. In 2016 you mean?

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1 Q. Yes.

2 A. Yes.

3 Q. Okay. And I assume that U Lock made
4 payments to keep the loan current; is that
5 correct?

6 A. Yes.

7 Q. Okay. And you then sold the Kubota
8 property or equipment and received \$45,000
9 for it, so you must have paid at least
10 \$45,000 from U Lock to Kubota; is that
11 correct?

12 A. Well, a lot of times if U Lock
13 didn't make enough money sometimes to cover
14 it, and I always -- I always put the money
15 in to cover the payments, so I put quite a
16 bit of money towards the payments.

17 Q. Is it -- is it correct that you
18 rented that equipment out periodically?

19 A. I don't know that we ever -- I don't
20 know that we ever rented it out. We put a
21 sign there that, for rent, but we didn't
22 rent that machine out. That stayed on the
23 property. But we have another machine like
24 that, so when someone would call and say,
25 hey, can I rent an excavator, yeah, we did

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1 do that a couple times, but only a handful
2 of times.

3 Q. When you say we had another piece of
4 equipment, who is the we you're talking
5 about, U Lock?

6 A. No, no, I'm sorry, no. Personally I
7 had another piece of equipment that was
8 almost identical to that, that one. And
9 this is going back years. I mean, I think
10 that was, if it was in like 2016 or
11 something. We put that there and we
12 (Inaudible) for rent, but what we rented was
13 a machine that was almost identical to that
14 one. But I don't -- I think -- I can't even
15 remember the charge. We rented, I think it
16 was rented to a friend just a couple times.
17 But as far as I know, I don't think that
18 particular machine owned by U Lock was
19 rented out ever.

20 Q. What is -- what is the involvement
21 of Eric Martin in U Lock?

22 A. None. He had -- I think he loaned
23 -- he loaned the down money for U Lock in
24 the beginning, but he was --

25 Q. And in fact, he was repaid by the --

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1 by the -- at the closing, or he was repaid
2 with money out of I believe Henry Moore's
3 escrow. So what, what did you pay Mr.
4 Martin; what did you pay Mr. Martin to loan
5 you the down payment for this property?

6 A. I don't -- I don't think anything.

7 Q. So he -- he did it as a -- as a
8 friendship?

9 A. Yes.

10 Q. Out of friendship?

11 A. Yeah.

12 Q. Okay. Let's see. Have you given a
13 complete list of all of the renters on that
14 property to the Trustee?

15 A. At the time I gave him all, you
16 know, when we filed the schedules, we gave
17 -- I gave him everything I knew about. And
18 as things came up, like, I believe the
19 tractor-trailer we were talking about
20 earlier was not on the schedule, but I
21 updated him on that. If anything did come
22 to light after the fact, we'd let him know.

23 Q. Well, you've controlled -- you've
24 controlled that property from 2015 up until
25 at least when the bankruptcy petition was

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1 filed, so it would seem logical that you
2 would have a list of tenants for all your --
3 all your lockers and there wouldn't be
4 people who had stuff stored there that you
5 wouldn't know about, even if you didn't know
6 them personally, so --

7 A. Yeah.

8 Q. So are you telling us that there are
9 tenants or renters that you don't know
10 about?

11 A. Well, there were -- I wasn't the one
12 -- when you're saying I was in control of
13 the property, I didn't do every task there
14 at the property, nor was I in control of
15 every aspect of it, so my brother kind of --

16 Q. Well, U Lock was, and you're the
17 president of U Lock, so it's your
18 responsibility?

19 A. Yeah, so like I said, Kash was the
20 (Inaudible) with the tenants and myself.

21 Q. Oh, so you're telling me Kash was in
22 charge of all the renters and had a complete
23 list of the tenants, of the renters?

24 A. I don't know exactly what he has. I
25 think you asked him that question before on

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1 the stand. I can't remember what he
2 answered, but I -- yeah, he did that way
3 more than I did. I just, like I said, I've
4 been trying to play catch-up here in the
5 past few months and, you know, like I said,
6 I didn't do every single task on that
7 property. So, yeah, he would -- he would
8 have more of a complete list than I have.
9 But I think we're -- we're pretty, pretty
10 much, I'd have to say 90, 98 percent or
11 something, you know, accurate when we give
12 Mr. Slone the statements, would be my guess.

13 But like I said --

14 MR. OTTO: Mr. Slone, we've had a
15 number of questions which in my view are
16 fairly important that Mr. Snyder has said he
17 can't answer because his brother Kash has
18 the information.

19 MR. SLONE: Well, we can take --
20 you can schedule a 2004 Examination of Kash
21 Snyder. Maybe that's what should be done.

22 MR. OTTO: I -- I was going to
23 ask, I'm not sure what the mechanism would
24 be, to do that or to continue the 341
25 meeting until Mr. Snyder, Mr. Kash Snyder is

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1 available.

2 MR. SLONE: Well, I won't close

3 --

4 MR. OTTO: I'll leave that to
5 your discretion.

6 MR. SLONE: I won't close -- I
7 will not close the meeting today. So we can
8 reschedule a continuation of it when we get
9 a date for Mr. Kash, or you can take a 2004
10 Examination, either way.

11 MR. OTTO: Okay. Let me -- let
12 me talk to Sarah Wenrich separately and --
13 and --

14 MR. SLONE: Yeah, I will not
15 close this.

16 MR. OTTO: Either I will --

17 MR. SLONE: I will not close the
18 meeting today. The meeting will be held
19 open.

20 MR. OTTO: That's all the
21 questions I have for now, but --

22 MR. SLONE: Okay.

23 MR. OTTO: -- I don't know if
24 Sarah or Christine have any.

25 MR. SLONE: Any other questions?

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1 MS. BIROS: I have one, Bill.

2 Bill I had one.

3 MR. OTTO: Yes, go ahead.

4 MS. BIROS: Is Biros on the
5 checking account for U Lock?

6 MR. OTTO: Mr. Snyder, did you
7 hear that question?

8 MR. GEORGE SNYDER: No, I'm
9 sorry.

10 MR. OTTO: Who, who has the --
11 who is authorized to sign, with Citizens
12 Bank to sign checks for U Lock?

13 MR. GEORGE SNYDER: Kash Snyder,
14 my brother.

15 MR. OTTO: Only Kash, not you?

16 MR. GEORGE SNYDER: Not me;
17 correct.

18 MR. OTTO: Only Kash, okay.

19 MR. GEORGE SNYDER: Yes.

20 MR. OTTO: Sarah, do you have any
21 questions?

22 MS. WENRICH: I do not have any
23 further questions at this time. Thank you.

24 MR. SLONE: Okay, what I'm going
25 to do, if there's no further questions, I

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1 will keep the meeting open and then --

2 MS. SHANNI SNYDER: I -- excuse
3 me, this is Shanni.

4 MR. SLONE: Yes.

5 MS. SHANNI SNYDER: I have
6 questions.

7 MR. SLONE: Okay, I'm giving --

8 MS. SHANNI SNYDER: (Inaudible).

9 MR. SLONE: Okay. Is it going to
10 be lengthy or within the next ten minutes?

11 MS. SHANNI SNYDER: No. Yes, we
12 should be good.

13 MR. SLONE: Okay, go.

14 EXAMINATION OF GEORGE SNYDER:

15 BY MS. SHANNI SNYDER

16 Q. Okay. George, you were the primary
17 officer of U Lock; isn't that right?

18 A. Yes.

19 Q. Did you answer?

20 A. Yes.

21 MR. SLONE: He said yes.

22 Q. Hello?

23 A. Correct.

24 Q. Okay. You were the primary
25 shareholder of U Lock; isn't that right?

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1 A. Yes, majority shareholder.

2 Q. When you started U Lock, did it have
3 any money?

4 A. No. We were (Inaudible).

5 Q. When you formed U Lock, did you
6 discuss the name with Christine and John
7 Biros?

8 A. I didn't finish answering your other
9 question when you said we didn't have any
10 money. We were supposed to, was promised
11 money by Biros to keep U Lock, you know, to,
12 to develop U Lock, so, but when they didn't
13 put up the money, then, no, we didn't have
14 any. So I'm sorry, what's your next
15 question?

16 Q. Okay. When you -- when you formed U
17 Lock, did you discuss the name with
18 Christine and John Biros?

19 A. Yes, we discussed everything
20 together. We met almost daily, but at the
21 very least weekly.

22 Q. Okay, when did U Lock open its bank
23 account?

24 A. I'm not sure exactly. I think we
25 purchased it in like 5/2015, something like

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1 that. It was sometime after that.

2 MR. OTTO: I'm sorry, I didn't
3 hear that date.

4 Q. (Inaudible).

5 A. I believe, I think just right after
6 we -- we purchased it. So I think probably,
7 if we bought it in July, I would say we had
8 the bank account by September. That's --

9 Q. The whole idea of U Lock was to get
10 this property and develop it; isn't that
11 right?

12 A. Correct.

13 Q. Christine Biros promised to put up
14 the money to help you with that; isn't that
15 right?

16 A. Yes.

17 Q. Did you have silent partners from
18 2015 to 2018?

19 A. Yeah, Christine Biros and John
20 Biros.

21 Q. And how often did you have meetings
22 with John and Christine Biros from 2015
23 through 2018 then?

24 A. I would -- 2015 to '18? I would say
25 with John, I would say almost every day.

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1 And then he was -- he relayed whatever
2 Christine would say to me. And then
3 Christine, and I wanted to clarify a
4 question I didn't get to finish answering
5 before. When I met Christine, it was every
6 Wednesday, and she would ask me to come down
7 to meet with her at her place of business,
8 which happened to be a bar or a tavern. And
9 I didn't drink; we don't drink. We didn't
10 sit at the bar. We'd sit in the office and
11 talk. And so it wasn't that just we just
12 ran into each other at some bar somewhere.
13 It was, she was the owner of this business.
14 We were meeting at her request there.

15 Q. Did you discuss the U Lock and its
16 plans at these meetings?

17 A. Yes, we always, we sat there for
18 hours. That's all we talked about.

19 Q. And you're saying it was a bar.
20 What was the name of the bar?

21 A. Caesar's Tavern. Well, we didn't
22 always meet at a bar. There -- we met
23 different places, wherever they requested.
24 You know, there were different places we
25 met, but a lot of it was at that -- at her

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1 place of business, Caesar's Tavern.

2 Q. Okay, so you discussed the U Lock
3 and its plans with them at those meetings,
4 and when did the meetings stop?

5 A. I'm not really sure. As far as the
6 -- as far as with Christine, it kind of
7 stopped a little earlier, like maybe in
8 2018. John I talked to a little bit less,
9 less, but I've met up with John just as
10 recently as last year (Inaudible). Maybe
11 even this year.

12 Q. And did you have progress updates
13 and meetings even after Christine Biros sued
14 you?

15 A. Yes. Yeah, we always did. Even I
16 think at one point they even, you know,
17 paused the lawsuit so we could talk about
18 moving forward.

19 Q. When you had these meetings during
20 the lawsuit, was Ms. Biros' attorney, was
21 Ms. Biros' attorney present with you?

22 A. No.

23 Q. Did you consider Ms. Biros the
24 control person of U Lock?

25 A. Yes.

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1 MR. SLONE: At what point?

2 Q. Even after the lawsuit, even after
3 the lawsuit, did you feel that Ms. Biros was
4 -- Ms. Biros was making the shots, calling
5 the shots in U Lock, making the decisions?

6 A. Yes. The whole time.

7 Q. U Lock had a company car it used; is
8 that correct?

9 A. Yes, truck, pickup truck.

10 Q. Who owned the company car?

11 A. I believe it's the Biros family.
12 I'm not exactly sure who it's titled to, but
13 I'm -- I believe someone in the Biros
14 family, Bob or John or I'm not sure.

15 Q. When did U Lock return it?

16 A. Just in recent years. We used it
17 from, I believe, I think 2015 maybe from the
18 beginning till I think '20, sometime in
19 2020. '21, '22. Yeah, so not the past two
20 years. Somewhere in 2020 they (Inaudible)
21 take it back.

22 Q. Okay, so from 2015 to 2020 the
23 company car belonged to the Biros family?

24 A. Yes.

25 Q. Can you hear me?

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1 A. Yeah, I can hear you.

2 Q. (Inaudible).

3 A. I'm sorry. Did I miss a question?

4 Go ahead.

5 Q. So from 2015 through the beginning
6 of 2020, the company car belonged to the
7 Biros family?

8 A. Oh, yeah, I thought I answered that.

9 Yes, yeah, we knew -- there was -- there
10 was a truck that was used on the facility,
11 and it belonged, to them and we used it
12 quite a bit. And then when it would need
13 any maintenance or anything, John would pick
14 up the truck, take it to the -- to get
15 inspected or whatever needed done, brakes
16 done or something, and he would bring it
17 back to the property.

18 Q. And did the Biros family place
19 trailers onto the property at U Lock?

20 A. Yes, two (Inaudible) like maybe 70-
21 foot mobile homes.

22 Q. Did you ask them to do that?

23 A. No.

24 Q. So the whole time, even after the
25 lawsuit, you considered Ms. Biros to be part

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1 of U Lock?

2 A. Yeah. And I believe they put those
3 trailers there after the lawsuit. They
4 just, yeah, she was always in control.

5 Q. And when Christine Biros sued U
6 Lock, did she ask the Court to order
7 repayment or payment to her for rent?

8 A. Oh, you mean this most recent thing
9 where they're asking for me, George Snyder,
10 to pay U Lock rent? Or U Lock to pay her
11 rent?

12 Q. No, I said when Christine Biros sued
13 U Lock, did she ask the Court to order
14 payment to her for rent?

15 A. No. She never mentioned that.

16 Q. Did Christine Biros ever send you a
17 bill for rent?

18 A. No, she did not.

19 Q. Did Christine Biros ever ask you to
20 pay her rent?

21 A. No, there was no mention of
22 (Inaudible).

23 Q. When U Lock purchased --

24 A. The other court (Inaudible).

25 Q. When U Lock purchased the property,

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1 did it have tires on it?

2 A. Yes, there were a lot of tires
3 there.

4 Q. What did U Lock do to improve this
5 property from 2015 to 2020?

6 A. I apologize, can you repeat that
7 question?

8 Q. What did U Lock do to improve the
9 property from 2015 to 2020?

10 A. No.

11 MR. SLONE: Where are we -- where
12 are we going with this? Just give me a
13 heads-up.

14 MS. SHANNI SNYDER: I only -- I
15 only have -- I only have a few more
16 questions, but I'm trying to determine
17 whether Christine Biros and the Biros
18 insurance trust are co-debtors or insiders
19 of U Lock.

20 MR. SLONE: Okay, you can ask a
21 few more questions.

22 MS. BIROS: I think that's
23 already been determined, so --

24 A. I'll answer pretty quickly. We did
25 everything there, from changing light bulbs

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1 to electrical service to guide wires, over a
2 couple hundred tons of substrate for the
3 parking lot. We fixed garage doors. We had
4 garage door openers installed. We met with
5 tenants. Developed roads to go down below,
6 a road going up to the highway. We did --
7 we did all, you know, all kind of stuff. We
8 removed a lot of the garbage from there,
9 cleaned up tires, recycled things.

10 There was dozens and dozens of TV's and
11 different things there. So the list is
12 quite extensive, but I'll keep it brief
13 since we want to move on here. So, but,
14 yeah, anything that was entailed down there,
15 we did the work. I did a lot of work
16 personally.

17 Q. Okay, I only have a few more
18 questions. U Lock had me watching its
19 Dropcamera; isn't that correct?

20 A. Yes.

21 Q. U Lock never paid me anything; isn't
22 that correct?

23 A. That's correct.

24 Q. Did Christine Biros know I was
25 helping?

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1 A. Yes, she knew every step of the way,
2 every --

3 Q. Did you tell her during your weekly
4 meetings?

5 A. Yes. I went over everything.

6 Q. And you considered my work to be a
7 favor; isn't that right?

8 A. Yes, at the time.

9 Q. You called it sisterly love; isn't
10 that right?

11 A. Oh, something like that. I think
12 Kash used those words.

13 Q. And Christine Biros didn't object to
14 me doing this work, did she? When I sued
15 you, someone handed you the summons; isn't
16 that right?

17 A. That's correct.

18 Q. You knew about the lawsuit, but you
19 didn't answer it; right?

20 A. Yes.

21 Q. Did I discuss the lawsuit with you?

22 A. No.

23 Q. Did I ask you not to hire an
24 attorney?

25 MR. OTTO: I'm sorry, I didn't

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1 hear the answer. I'm sorry, what?

2 A. I'm sorry.

3 Q. Did I discuss the lawsuit --

4 MR. OTTO: What was the answer to
5 your first question? Did you discuss the
6 lawsuit --

7 A. No, I did not.

8 MR. OTTO: -- with Ms. Snyder?

9 A. I did not discuss the lawsuit. I
10 did not discuss the lawsuit with her.

11 MR. OTTO: Okay.

12 Q. Did I ask you not to hire an
13 attorney?

14 A. No.

15 Q. Did I tell you to default?

16 A. No.

17 MS. SHANNI SNYDER: That's all my
18 questions.

19 MR. SLONE: Okay, thank you.
20 Okay.

21 MS. SHANNI SNYDER: You're
22 welcome.

23 MR. SLONE: I will hold the
24 meeting open for the possible questions for
25 Kash Snyder, or if you want to schedule a

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1 2004 Examination, let me know. And let me
2 know when Mr. Snyder, Kash Snyder would be
3 available, and then we'll get something
4 scheduled. Any other questions?

5 MR. GEORGE SNYDER: Okay, Mr. --
6 and also, Mr. Slone, if there's some of
7 those things, I could probably get some
8 answers for some things either maybe by
9 phone with Kash or I could, you know, look,
10 look for some answers for some of the things
11 (Inaudible) might be -- might have been
12 omitted today.

13 MR. SLONE: Well, get, all the
14 things that have been asked for, get that
15 information either filed or sent to me and
16 then, then we'll see what we're going to do
17 with -- when we're going to schedule Kash
18 Snyder.

19 MR. GEORGE SNYDER: Okay, sounds
20 --

21 MR. SLONE: Okay.

22 MS. BIROS: Mr. Slone, Christine
23 Biros here. I have a question.

24 MR. SLONE: Yes.

25 MS. BIROS: I just want -- I just

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1 want it on the record that most of this that
2 I just heard is not correct and I knew
3 nothing about (Inaudible).

4 MR. SLONE: Okay, well, we're --
5 this is only to ask questions of the
6 representative of U Lock.

7 MS. BIROS: Okay.

8 MR. SLONE: We're not -- we're
9 not trying the case here.

10 MS. BIROS: Okay.

11 MR. SLONE: But your comments are
12 received. So we're -- I'm going to -- I'm
13 going to close the -- I'm going to stop the
14 recording now and we'll reschedule later.
15 Thank you. (End of recording.)

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C E R T I F I C A T E

I, Mary J. Carney, a Court Reporter and Notary
Public in and for the Commonwealth of Pennsylvania,
do hereby certify that the foregoing is a true and
correct transcription of the recorded proceedings of
the 341(a) Meeting and constitutes a true record.

This 27th day of January, 2023.

Notary Public

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